

11740-PAJ

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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GREAT AMERICAN INSURANCE	:	07 CIV 6421 (PAC) (THK)
COMPANY OF NEW YORK,	:	
Plaintiff,	:	
v.	:	
	:	ANSWER TO
ADVANCE OCEAN INC., NIPPON YUSEN	:	CROSS-CLAIMS
KAISHA, NYK (NORTH AMERICA) INC.,	:	
BURLINGTON NORTHERN SANTA FE	:	
CORPORATION, BNSF RAILWAY	:	
COMPANY, THE BURLINGTON	:	
NORTHERN AND SANTA FE RAILWAY	:	
COMPANY,	:	
Defendants.	:	
-----	X	

Defendant, **ADVANCE OCEAN INC.**, by its attorneys, **JUNGE & MELE, LLP**,
hereby sets forth the following as its Answer to the Cross-Claims of Defendants,
NIPPON YUSEN KAISHA, and NYK (NORTH AMERICA) INC. :

FIRST: Answering Defendant repeats and re-alleges each and every
admission, denial and defense set forth in its Answer to the Amended Complaint with
Cross-Claims, as if more fully set forth at length herein.

SECOND: Answering Defendant denies each and every allegation contained in
paragraphs "TWENTY-SEVENTH," "TWENTY-EIGHTH" and "TWENTY-NINTH" in
the "FIRST CROSS-CLAIM" and "SECOND CROSS-CLAIM" of Defendants, NIPPON
YUSEN KAISHA, and NYK (NORTH AMERICA) INC.

WHEREFORE, Answering Defendant demands that the Cross-Claims be

dismissed with costs to Answering Defendant as against cross-claiming Defendants, and that the Court grant such other, further and different relief as the justice of the cause may require.

Dated in the City of New York on January 2, 2008

Respectfully submitted,

JUNGE & MELE, LLP
Attorneys for Defendant
Advance Ocean Inc.

/s/ Peter A. Junge

By _____
Peter A. Junge (PJ-0745)
29 Broadway - 9th Floor
New York, NY 10006
(212) 269-0061